

AMINI^{LLC}

Lita Beth Wright
MEMBER NY & NJ BARS

212.497.8207
lbwright@aminillc.com

October 24, 2019

VIA ECF

The Honorable Freda L. Wolfson
United States District Judge
Clarkson S. Fisher Federal Building
402 East State Street, Room 5050
Trenton, NJ 08608

Re: U.S. v. Chabot, Case No. 3:14-cv-03055(FLW)(DEA)

Dear Judge Wolfson:

My firm and I were retained yesterday evening to represent non-party Richard A. Levine, Esq., of Roberts & Holland, LLP, formerly co-counsel to Mr. Chabot in this case.¹ Because Mr. Levine was observing the Jewish holidays on Monday and Tuesday he was not able to focus on the Government's filing of last Friday evening (Doc. No. 150) containing serious allegations of professional misconduct against him until yesterday morning, at which point he determined that he should engage his own counsel to advise him as to how to address those allegations. While there is obviously a complicated history here that we will need some time to come up to speed on, we are writing the Court now to make two requests.

First, the Government's allegations were made in a supplemental brief related to a pending motion that seeks no sanctions or other relief against Mr. Levine, and the Government itself does not seem to be moving for any relief against Mr. Levine but rather deferring to the Court regarding what further steps should be taken with respect to the allegations concerning Mr. Levine. We will be filing on Mr. Levine's behalf a full response to the Government's allegations concerning him, addressing both the facts and the relevant rules of professional conduct. Given the time necessary for us to get up to speed on the lengthy prior history of this case and the fact that our firm will be moving to new offices in late November, we propose to do so no later than Wednesday, December 4.

¹ I am a member of the bar of this Court as well as the New Jersey state bar. My colleagues and I have previously represented the Roberts & Holland firm and various of its partners in other matters.

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Second, the current deadline for Mr. Levine to submit the supplemental information the Court directed him to submit during the August 20, 2019 hearing is tomorrow, October 25. Given our retention and the change of circumstances caused by the substance of the Government's recent filing, we respectfully request a one-week adjournment of that deadline until November 1, so that we may advise Mr. Levine with respect to the submission the Court has directed him to make.

Respectfully submitted,

/s/ Lita Beth Wright

Lita Beth Wright

cc: All Counsel of Record (*via ECF*)
Richard A. Levine, Esq. (*via email*)